

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION

UNITED STATES OF AMERICA	)	
	)	No. 3:22-cr-00327
v.	)	
	)	
	)	Hon. Aleta Trauger
[1] CHESTER GALLAGHER	)	
[2] HEATHER IDONI	)	
[3] CALVIN ZASTROW	)	
[4] COLEMAN BOYD	)	
[6] PAUL VAUGHN	)	
[7] DENNIS GREEN	)	

**MOTION FOR ADMISSION *PRO HAC VICE***

Pursuant to Rule 83.01 of the Local Rules of Court for the United States District Court for the Middle District of Tennessee, WILFRED T. BEAYE, JR. hereby moves for admission to appear *pro hac vice* in the above-captioned action for Plaintiff United States of America.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct:

1. Local Rule 83.01(b)(1) requires that, to be eligible for admission to the bar of this Court, an attorney must be a member in good standing of the bar of the State of Tennessee or any other State or Territory of the United States. If the applicant is not a member of the bar of Tennessee, the applicant must also be a member in good standing of a United States District Court or a United States appellate court. Alternatively, pursuant to Local Rule 83.01(b)(7), any attorney employed in the office of the United States Attorney for the Middle District of Tennessee who is admitted to the bar of any State or Territory of the United States may be admitted to practice in this Court and entered on the roll of the Court without the necessity of either an application for admission or payment of any fee.

2. I am a Trial Attorney of the U.S. Department of Justice, Civil Rights Division, Criminal Section. I am authorized by the Deputy Assistant Attorney General of the Civil Rights Division and U.S. Attorney for the Middle District of Tennessee to conduct grand jury proceedings in the Middle District of Tennessee. I am a member in good standing of the bar of United States Court of Appeals for the Third Circuit. *See Attachment (Third Circuit certificate of good standing, November 21, 2023).*

3. I am not, nor have I ever been, the subject of disciplinary proceedings by any disciplinary authority, court, or tribunal.

4. I have not been found in contempt by any court or tribunal.

5. I have not been sanctioned pursuant to 28 U.S.C. § 1927.

6. I have never been censured, suspended, disbarred, or denied admission or readmission by any court or tribunal.

7. I have not been charged, arrested, or convicted of a criminal offense or offenses.

8. I understand that pursuant to Local Rule 83.01(d)(1), if I am not both a member of the Tennessee bar and admitted to the bar of this Court, local counsel must be retained. Local counsel has been retained in this matter as follows: Amanda Klopf, Assistant United States Attorney, United States Attorney's Office for the Middle District of Tennessee, 719 Church Street, Suite 3300, Nashville, TN 37203, phone number (615) 736-5151 and email address is: [Amanda.Klopf@usdoj.gov](mailto:Amanda.Klopf@usdoj.gov).

9. I have read and am familiar with Local Rules of Court for the United States District Court Middle District of Tennessee.

10. By seeking admission to practice before this Court, I acknowledge my responsibility for compliance with all rules of this Court and confer disciplinary jurisdiction upon

this Court for any alleged misconduct arising in the course of the proceeding.

Respectfully submitted,

/s/ Wilfred T. Beaye, Jr.

WILFRED T. BEAYE, JR.

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HENRY C. LEVENTIS

nited States Attorney for the

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By: /s/ Amanda Klopf

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*Counsel for the United States of America*

## **CERTIFICATE OF SERVICE**

I certify that a true and correct copy of the foregoing Motion For Admission *Pro Hac Vice* was electronically filed with the Clerk on December 4, 2023, and service was made upon all persons registered in that case via CM/ECF and/or by email, including:

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*Attorney for Defendant Calvin Zastrow*

s/ Amanda Klopf  
AMANDA KLOPF  
Assistant United States Attorney

**UNITED STATES COURT OF APPEALS FOR  
THE THIRD CIRCUIT  
CERTIFICATE OF GOOD STANDING**

I, PATRICIA S. DODSZUWEIT, Clerk of the United States Court of Appeals for the Third Circuit, DO HEREBY CERTIFY THAT **Wilfred T. Beaye, Jr., Esq.** was admitted to practice before this Court as an attorney and counselor on April 16, 2019, he or she has never been suspended nor disbarred, and is presently a member of the bar of this Court in good standing.

I DO FURTHER CERTIFY that there are no grievances or complaints pending before the Disciplinary Committee of this Court against said attorney and counselor.

IN TESTIMONY WHEREOF, I have hereunto  
subscribed my name and affixed the seal  
of the said Court, at Philadelphia,  
this **21st** day of **November 2023**.

PATRICIA S. DODSZUWEIT, Clerk  
United States Court of Appeals  
For the Third Circuit



By: \_\_\_\_\_  
Kelly A. Glaum  
Chief Deputy Clerk